

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

) CRIMINAL NO.

04 CR 10246 PBS

)  
v.  
)

) VIOLATION:

BRIAN TODD and  
SHAUN TODD

) 18 U.S.C. § 2113(b)--  
) Bank Larceny  
)

INDICTMENT

COUNT ONE: (18 U.S.C. § 2113(b)-- Bank Larceny)

The Grand Jury charges that:

On or about October 16, 2000, at Wilmington, in the District of Massachusetts,

BRIAN TODD and SHAUN TODD, defendants herein, did take and carry away, with intent to steal and purloin, money exceeding \$1,000 belonging to, or in the care, custody, control, management, or possession of a bank, to wit: \$100,000 from an automated teller machine at 223 Lowell Street in Wilmington, Massachusetts.

All in violation of Title 18, United States Code, Sections 2113(b) and 2.

A TRUE BILL

*Mary Burke*  
FOREPERSON OF THE GRAND JURY

*DeRolley*

DONALD L. CABELL  
ASSISTANT U.S. ATTORNEY

DISTRICT OF MASSACHUSETTS; 8-18, 2004.

Returned into the District Court by the Grand Jurors and filed.

*Mary Burke*  
DEPUTY CLERK  
8/18/04  
*(u/f) 11:45*

JS 45 (5/97) - (Revised USAO MA 3/25/02)

**04 CR 10246 PDS**

U.S. District Court - District of Massachusetts

**Criminal Case Cover Sheet**

Place of Offense:

Category No. IIInvestigating Agency FBICity Wilmington**Related Case Information:**County Middlesex

Superseding Ind./ Inf. \_\_\_\_\_ Case No. \_\_\_\_\_  
 Same Defendant \_\_\_\_\_ New Defendant \_\_\_\_\_  
 Magistrate Judge Case Number 04-1010-JGD  
 Search Warrant Case Number \_\_\_\_\_  
 R 20/R 40 from District of \_\_\_\_\_

**Defendant Information:**Defendant Name Brian Todd

Juvenile

 Yes No

Alias Name \_\_\_\_\_

Address \_\_\_\_\_

Birth date: 1976 SS#: 4566 Sex: M Race: White Nationality: AmericanDefense Counsel if known: Scott F. Gleason Address: 163 Merrimack  
Haverhill, MA

Bar Number: \_\_\_\_\_

**U.S. Attorney Information:**AUSA Donald L. Cabell Bar Number if applicable \_\_\_\_\_Interpreter:  Yes  No List language and/or dialect: \_\_\_\_\_Matter to be SEALED:  Yes  No Warrant Requested Regular Process In Custody**Location Status:**Arrest Date: March 9, 2004 Already in Federal Custody as \_\_\_\_\_ in \_\_\_\_\_. Already in State Custody \_\_\_\_\_  Serving Sentence  Awaiting Trial On Pretrial Release: Ordered by M.J. Judith Dein on March 9, 2004Charging Document:  Complaint  Information  IndictmentTotal # of Counts:  Petty  Misdemeanor  Felony 1

Continue on Page 2 for Entry of U.S.C. Citations

I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.

Date: August 18, 2004Signature of AUSA: 

~~JS 45 (5/97) - (Revised USAO MA 3/25/02)~~ Page 2 of 2 or Reverse

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Name of Defendant Brian Todd

## U.S.C. Citations

<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1 <u>18 U.S.C. §2113(b)</u>	<u>Bank Larceny</u>	<u>1</u>
Set 2 _____	_____	_____
Set 3 _____	_____	_____
Set 4 _____	_____	_____
Set 5 _____	_____	_____
Set 6 _____	_____	_____
Set 7 _____	_____	_____
Set 8 _____	_____	_____
Set 9 _____	_____	_____
Set 10 _____	_____	_____
Set 11 _____	_____	_____
Set 12 _____	_____	_____
Set 13 _____	_____	_____
Set 14 _____	_____	_____
Set 15 _____	_____	_____

ADDITIONAL INFORMATION: FBI

Criminal Case Cover Sheet

Place of Offense:

Category No. II

Investigating Agency FBI

City Wilmington**Related Case Information:**County Middlesex

Superseding Ind./ Inf. \_\_\_\_\_ Case No. \_\_\_\_\_  
 Same Defendant \_\_\_\_\_ New Defendant \_\_\_\_\_  
 Magistrate Judge Case Number 04-1009-JGD  
 Search Warrant Case Number \_\_\_\_\_  
 R 20/R 40 from District of \_\_\_\_\_

**Defendant Information:**Defendant Name Shaun Todd

Juvenile

 Yes No

Alias Name \_\_\_\_\_

Address \_\_\_\_\_

Birth date: 1978 SS#: 2739 Sex: M Race: White Nationality: AmericanDefense Counsel if known: Scott F. Gleason Address: 163 Merrimack  
Haverhill, Mass.

Bar Number: \_\_\_\_\_

**U.S. Attorney Information:**AUSA Donald L. Cabell Bar Number if applicable \_\_\_\_\_Interpreter:  Yes  No List language and/or dialect: \_\_\_\_\_Matter to be SEALED:  Yes  No Warrant Requested Regular Process In Custody**Location Status:**Arrest Date: March 9, 2004 Already in Federal Custody as \_\_\_\_\_ in \_\_\_\_\_. Already in State Custody \_\_\_\_\_  Serving Sentence  Awaiting Trial On Pretrial Release: Ordered by M.J. Judith Dein on March 23, 2004Charging Document:  Complaint  Information  IndictmentTotal # of Counts:  Petty \_\_\_\_\_  Misdemeanor \_\_\_\_\_  Felony 1

Continue on Page 2 for Entry of U.S.C. Citations

I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.

Date: August 18, 2004Signature of AUSA: D.L. Cabell

04 CR 1 0246 PBS

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Name of Defendant Shaun Todd**U.S.C. Citations**

<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1 <u>18 U.S.C. §2113(b)</u>	<u>Bank Larceny</u>	<u>1</u>
Set 2 _____	_____	_____
Set 3 _____	_____	_____
Set 4 _____	_____	_____
Set 5 _____	_____	_____
Set 6 _____	_____	_____
Set 7 _____	_____	_____
Set 8 _____	_____	_____
Set 9 _____	_____	_____
Set 10 _____	_____	_____
Set 11 _____	_____	_____
Set 12 _____	_____	_____
Set 13 _____	_____	_____
Set 14 _____	_____	_____
Set 15 _____	_____	_____

ADDITIONAL INFORMATION: FBI